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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ROTTEN RECORDS, INC.

Plaintiff,

v.

JOHN DOE subscriber assigned IP address
24.45.63.136,

Defendant.

Civil Action No. 3:15-cv-03463-MAS-TJB

**PLAINTIFF'S MOTION TO TRANSFER VENUE TO EASTERN DISTRICT
OF NEW YORK**

The plaintiff Rotten Records, Inc. ("Plaintiff") respectfully moves for an order pursuant to 28 U.S.C §1404 to transfer this matter to the Eastern District of New York.

In support of its Motion, Plaintiff states the following:

1. This is a copyright infringement case filed May 20, 2015 against a John Doe Defendant known to Plaintiff only by an IP address.
2. Defendant's true identity is known by his or her Internet Service Provider ("ISP").

3. After receiving a Court Order to obtain Defendant's identifying information from his or her ISP, Plaintiff learned that the IP address belongs to an individual in Ridge, New York.

4. Plaintiff conducted a due diligence investigation and determined that the appropriate individual to be named in the Complaint is an individual residing Ridge, NY.

5. In order to properly serve its Complaint and prosecute its case, Plaintiff requests transfer of this case to the U.S.D.C. for the Eastern District of New York.

6. Pursuant to Fed. R. Civ. P. 1404(a), a district court may transfer any civil action to another district "for the convenience of the parties and witnesses, in the interest of justice", or "to any other district or division where it might have been brought...".

7. Pursuant to L.Civ.R. 7.1(d)(4), Plaintiff believes the instant motion adequately addresses the relevant issues and law and therefore a brief is unnecessary.

WHEREFORE, Plaintiff respectfully requests that the Court transfer the above-captioned case to the Eastern District of New York.

Respectfully submitted,
Plaintiff, Rotten Records, Inc.
By its attorneys,



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Dated: October 19, 2015

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CERTIFICATE OF SERVICE

The undersigned, counsel for the Plaintiff, hereby certifies that a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.



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